

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ZENIMAX MEDIA INC. and  
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,  
PALMER LUCKEY,  
and FACEBOOK, INC.

Defendants.

[illegible]

**CIVIL CASE NO. 3:14-cv-01849-P**

**PLAINTIFFS' APPENDIX TO THEIR OPPOSITION TO DEFENDANTS'  
MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS AND  
SUPPLEMENTAL INTERROGATORY RESPONSE**

The following exhibits have been excerpted and/or redacted as indicated to remove confidential information, including any confidentiality legends, potentially confidential information of Defendants, and material that is not relevant to the determination of Defendants' motion.

<b><u>DOCUMENT</u></b>	<b><u>EXHIBIT</u></b>	<b><u>PAGE(S)</u></b>
Defendants' First Set of Requests for Production (dated July 11, 2014) (redacted and excerpted)	1	1-11
Plaintiffs' Responses to Defendants' First Set of Requests for Production (dated August 11, 2014) (redacted and excerpted)	2	12-21
Defendants' Second Set of Requests for Production (dated March 3, 2015) (redacted and excerpted)	3	22-31
Facebook's First Set of Interrogatories (dated March 3, 2015) (redacted and excerpted)	4	32-41
Plaintiffs' Responses to Facebook's First Set of Interrogatories (dated April 2, 2015) (redacted and excerpted)	5	42-51
Plaintiffs' Responses to Defendants' Second Set of	6	52-62

Requests for Production (dated April 2, 2015) (excerpt)

Defendants' Third Set of Requests for Production (dated April 17, 2015) (redacted)	7	63-70
Plaintiffs' Responses to Defendants' Third Set of Requests for Production (dated May 18, 2015) (redacted and excerpted)	8	71-80
Letter from P. Anthony Sammi to M. Rhodes (dated May 22, 2015) (redacted and excerpted)	9	81-85
Email from M. Caplan to K. Hemr and others (dated June 3, 2015) (redacted and excerpted)	10	86-88
Letter from K. Hemr to M. Rhodes and R. Smith (dated June 12, 2015)	11	89-91

Dated: August 7, 2015

Respectfully submitted,

P. ANTHONY SAMMI  
E-mail: Anthony.Sammi@skadden.com  
KURT WM. HEMR  
E-mail: Kurt.Hemr@skadden.com  
JAMES Y. PAK  
Texas State Bar No. 24086376  
E-mail: James.Pak@skadden.com  
KRISTEN VOORHEES  
E-mail: Kristen.Voorhees@skadden.com  
DEVIN A. KOTHARI  
E-mail: Devin.Kothari@skadden.com  
(the foregoing attorneys admitted *pro hac vice*)  
**SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP**  
Four Times Square  
New York, New York 10036  
Telephone No.: 212-735-3000  
Facsimile No.: 212-735-2000

s/ Phillip B. Philbin  
PHILLIP B. PHILBIN  
Texas State Bar No. 15909020  
E-mail: phillip.philbin@haynesboone.com  
MICHAEL D. KARSON  
Texas State Bar No. 24090198  
E-mail: michael.karson@haynesboone.com  
**HAYNES AND BOONE LLP**  
2323 Victory Avenue, Suite 700  
Dallas, Texas 75219  
Telephone No.: 214-651-5000  
Facsimile No.: 214-651-5940

*Attorneys for Plaintiffs  
ZeniMax Media Inc. and id Software LLC*

**CERTIFICATE OF SERVICE**

On August 7, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: August 7, 2015

*s/ Phillip B. Philbin*

Phillip B. Philbin